# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

MOM CA Investco LLC, et al., 1

Case No. 25-10321 (BLS)

Debtors.

(Jointly Administered)

# NOTICE OF AGENDA FOR HEARING ON SEPTEMBER 22, 2025 AT 1:30 P.M. (ET)

This proceeding will be conducted in-person. Delaware counsel is expected to appear in person and all other parties are permitted to appear remotely via Zoom.

Please refer to Judge Shannon's Chambers Procedures (<a href="https://www.deb.uscourts.gov/judge-brendan-l-shannon">https://www.deb.uscourts.gov/judge-brendan-l-shannon</a>) and the Court's website (<a href="http://www.deb.uscourts.gov/ecourt-appearances">http://www.deb.uscourts.gov/ecourt-appearances</a>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Shannon's expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (ET) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors' headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

### **FINAL FEE APPLICATIONS:**

 Combined Fifth Monthly and Final Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the (I) Monthly Period from July 1, 2025 Through August 18, 2025 and (II) Final Period from February 28, 2025 Through August 18, 2025 [Docket No. 785– filed on September 8, 2025]

Objection/Response Deadline September 15, 2025 at 4:00 p.m. (ET)

Objection/Responses Received: None.

#### **Related Documents:**

- A. First Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period February 28, 2025 Through March 31, 2025 [Docket No. 461 filed on May 30, 2025]
- B. Certificate of No Objection Regarding First Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period February 28, 2025 Through March 31, 2025 [Docket No. 537 filed on June 16, 2025]
- C. Second Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period April 1, 2025 Through April 30, 2025 [Docket No. 631 – filed on July 1, 2025]
- D. Certificate of No Objection Regarding Second Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period April 1, 2025 Through April 30, 2025 [Docket No. 673 – filed on July 16, 2025]
- E. Third Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtor and Debtor in Possession for the Period May 1, 2025 Through May 31, 2025 [Docket No. 732 filed on August 11, 2025]
- F. Certificate of No Objection Regarding Third Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period May 1, 2025 Through May 31, 2025 [Docket No. 780 filed on August 26, 2025]

- G. Fourth Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period June 1, 2025 Through June 30, 2025 [Docket No. 733 filed on August 11, 2025]
- H. Certificate of No Objection Regarding Fourth Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period June 1, 2025 Through June 30, 2025 [Docket No. 781 – filed on August 26, 2025]
- I. Certification of Counsel Regarding Combined Fifth Monthly and Final Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the (I) Monthly Period July 1, 2025 Through August 18, 2025 and (II) Final Period February 28, 2025 Through August 18, 2025 [Docket No. 792 filed on September 16, 2025]

<u>Status</u>: A Certification of Counsel has been filed. No hearing is necessary unless the Court has questions.

2. Final Fee Application of Stretto, Inc. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Administrative Advisor to the Debtors and Debtors in Possession for the period from February 28, 2025 to August 18, 2025 [Docket No. 786 – filed on September 8, 2024]

Response/Objection Deadline: September 15, 2025 at 4:00 p.m. (ET).

Responses Received: None.

#### Related Documents:

A. Certification of Counsel Regarding Omnibus Order Awarding Final Fee Applications [Docket No. 793 – filed on September 16, 2025]

<u>Status</u>: A Certification of Counsel has been filed. No hearing is necessary unless the Court has questions.

3. Second Monthly and Final Application of Bienert Katzman Littrell Williams LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Special Counsel to the Debtors and Debtors in Possession for the (I) Monthly Period August 1, 2025 Through August 18, 2025 and for the (II) Final Period April 11, 2025 to August 18, 2025 [Docket No. 788 – filed on September 8, 2024]

Objection/Response Deadline September 15, 2025 at 4:00 p.m. (ET)

Objection/Responses Received: None.

# **Related Documents:**

- A. Combined First Monthly Application of Bienert Katzman Littrell Williams LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Special Counsel to the Debtors and Debtors in Possession for the Period April 11, 2025 Through July 31, 2025 [Docket No. 737 filed on August 12, 2025]
- B. Certificate of No Objection Regarding Combined First Monthly Application of Bienert Katzman Littrell Williams LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Special Counsel to the Debtors and Debtors in Possession for the Period April 11, 2025 Through July 31, 2025 [Docket No. 782 filed on August 27, 2025]
- C. Certification of Counsel Regarding Omnibus Order Awarding Final Fee Applications [Docket No. 793 filed on September 16, 2025]

<u>Status</u>: A Certification of Counsel has been filed. No hearing is necessary unless the Court has questions.

4. Fifth and Final Staffing and Compensation Report of FTI Consulting, Inc. as Chief Restructuring Officer and Supporting Personnel to the Debtors for the Period July 1, 2025 Through August 29, 2025 [Docket No. 790 – filed on September 8, 2025]

Objection/Response Deadline September 15, 2025 at 4:00 p.m. (ET)

Objection/Responses Received: None.

Related Documents: None.

- A. First Staffing and Compensation Report of FTI Consulting, Inc. as Chief Restructuring Officer and Supporting Personnel to the Debtors for the Period February 28, 2025 through March 31, 2025 [Docket No. 373 filed on May 8, 2025]
- B. Second Staffing and Compensation Report of FTI Consulting, Inc. as Chief Restructuring Officer and Supporting Personnel to the Debtors for the Period April 1, 2025 Through April 30, 2025 [Docket No. 533 filed on June 13, 2025]
- C. Third Staffing and Compensation Report of FTI Consulting, Inc. as Chief Restructuring Officer and Supporting Personnel to the Debtors for the Period May 1, 2025 Through May 31, 2025 [Docket No. 683 filed on July 17, 2025]

- D. Fourth Staffing and Compensation Report of FTI Consulting, Inc. as Chief Restructuring Officer and Supporting Personnel to the Debtors for the Period June 1, 2025 Through June 30, 2025 [Docket No. 779 filed on August 22, 2025]
- E. Certification of Counsel Regarding Omnibus Order Awarding Final Fee Applications [Docket No. 793 filed on September 16, 2025]

<u>Status</u>: A Certification of Counsel has been filed. No hearing is necessary unless the Court has questions.

5. First Monthly and Final Application of Buchalter, a Professional Corporation for Compensation for Services Rendered and for Reimbursement of Expenses as Special Counsel to the Debtors and Debtors in Possession for the period February 28, 2025 to August 18, 2025 [Docket No. 791 – filed on September 8, 2024]

Objection/Response Deadline September 15, 2025 at 4:00 p.m. (ET)

Objection/Responses Received: None.

# **Related Documents:**

A. Certification of Counsel Regarding Omnibus Order Awarding Final Fee Applications [Docket No. 793 – filed on September 16, 2025]

<u>Status</u>: A Certification of Counsel has been filed. No hearing is necessary unless the Court has questions.

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Dated: September 18, 2025 Wilmington, Delaware Respectfully submitted,

# /s/ Sarah R. Gladieux

Christopher M. Samis (No. 4909) Aaron H. Stulman (No. 5807) R. Stephen McNeill (No. 5210) Gregory J. Flasser (No. 6154) Sarah R. Gladieux (No. 7404)

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